

GEF/mmg  
4/07/2014

IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO

IN RE:

CASE NO. 13-14658

ESS AUTOMOTIVE, INC.

CHAPTER 11

Debtor (s)

JUDGE ARTHUR I HARRIS

**RESPONSE TO MOTION OF THE UNITED STATES TRUSTEE  
TO CONVERT OR DISMISS**

Now comes the Debtor and suggests that the Motion of the United States Trustee is not well taken. The Debtor is seriously pursuing sale options and a sale in this case would benefit all parties and therefore, the Debtor requests that it be granted additional time to propose a sale.

Respectfully submitted,

/s/ Glenn E. Forbes  
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**CERTIFICATE OF SERVICE**

I hereby certify that on April 10, 2014, a true and correct copy of the Response to Trustee's Motion to Convert or Dismiss was served:

Via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

Amy L. Good, Esq., on behalf of the Office of the U.S. Trustee, at [amy.l.good@usdoj.gov](mailto:amy.l.good@usdoj.gov)

Timothy M. Sullivan at [tim@tmslaw.net](mailto:tim@tmslaw.net), [Elaine@tmslaw.net](mailto:Elaine@tmslaw.net), [martin@tmslaw.net](mailto:martin@tmslaw.net), [Jillian@tmslaw.net](mailto:Jillian@tmslaw.net)

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